

A 17/OPP#34139

Attachment 4

1PP

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Arthur Grube@X400 on 02/26/98 08:39:10 AM

To: William Hazel@EPA, Michael Metzger@EPA
cc: Mark Dow@EPA
Subject: Terbufos usage

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Bill

I have looked at your CCmails to Mark and have the following comments.

Bananas: We have Landell Mills data. The description you give of how they collect their data is agrees with what I know about them. We also have FATUS (Foreign Ag Trade data for the US). Unfortunately we have no way of knowing in what proportion treated bananas were sent to the US. I have looked at usage of terbufos in the countries from which we import most of our bananas and also at the fraction of the production in those countries that we import. The 28% of imported bananas treated is probably not unreasonable. Calculations based on my data show that if imported bananas are treated in the same proportion as all bananas in the exporting countries about 26% of our imported bananas would be treated. If treated bananas were always sent to the US when available as much as 57% of our imports could be treated and if untreated bananas were always sent to the US when available about 6% of our banana imports would be treated.

I pretty much agree with the registrant estimates of recent usage in the U.S. We should agree because Doane is a major part of our data.

	Registrant		BEAD	
	avg	max	avg	max
field corn	7.3	7.8	8	11
sweet corn	5.3	7.5	6	9
sorghum	2.5	4.2	2	4
sugar beets	34.6	37.0	31	37

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